

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE:	BECKHAM JEWELRY, INC.	CASE NO.	25-01234-JAW
	DEBTOR(S)	CHAPTER	11

**UNITED STATES TRUSTEE’S OBJECTION TO DEBTOR’S MOTION FOR INTERIM
AND FINAL ORDERS AUTHORIZING USE OF CASH COLLATERAL [DKT. #14]**

COMES NOW David W. Asbach, Acting United States Trustee for Region 5 (“UST”), by and through undersigned counsel, and files this Objection to the Debtor’s Motion for Interim and Final Orders Authorizing Use of Cash Collateral (Dkt. #14), in the above styled and numbered cause, and in support thereof respectfully submits the following:

1. The UST requests that relief be approved only on an interim basis at the initial hearing on this matter.
2. Paragraph #4 of the motion states that the “Debtor requests to close all existing bank accounts and centralize their depository account with BankPlus or Regions, including but not limited to Debtor-in-Possession (DIP) accounts, and will not open any additional accounts at other financial institutions without court approval. The Debtor also requests permission to continue using existing bank accounts until the DIP accounts are created.” Dkt. #14, at ¶ 4. (Emphasis added).
3. The UST requests that the Debtor clarify that only debtor-in-possession (“DIP”) bank accounts shall be opened by the Debtor at a UST authorized depository.
4. The UST requests that the Debtor close all of its existing pre-petition bank accounts within thirty (30) days of the interim hearing on this matter. The UST also requests that the Debtor

report on all Debtor bank accounts, including all bank accounts in existence at the time of the filing of this case, in the Debtor's monthly operating reports ("MORs").

5. The UST requests additional information on some of the expense items listed in the Debtor's interim projected budget:

- (a) Bank Charges of \$415.00 per month;
- (b) Dues and Subscriptions of \$836.25 per month;
- (c) Professional Fees of \$3,000.00 per month;
- (d) Payroll of \$2,678.25 per month;
- (e) Owner's Payroll of \$4,200.00 per month; and
- (f) Reserve expense of \$1,000.00 per month.

6. The UST reserves the right to raise additional objections at any hearing on this matter.

WHEREFORE, PREMISES CONSIDERED, the United States Trustee prays that the Court consider the UST's objection before ruling on the Debtor's motion. The United States Trustee further prays for all general and equitable relief to which entitled.

RESPECTFULLY SUBMITTED, this the 20th day of May, 2025.

DAVID W. ASBACH
Acting United States Trustee
Region 5, Judicial Districts of
Louisiana and Mississippi

By: /s/Christopher J. Steiskal, Sr.
CHRISTOPHER J. STEISKAL, SR.

CHRISTOPHER J. STEISKAL, SR. (MSB #101654)
TRIAL ATTORNEY
UNITED STATES DEPARTMENT OF JUSTICE
OFFICE OF THE UNITED STATES TRUSTEE
501 EAST COURT STREET, SUITE 6-430

JACKSON, MS 39201
TEL: (601) 965-5241
EMAIL: christopher.j.steiskal@usdoj.gov

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing pleading has been served this day on the below named individual(s) via first class United States Mail at the address listed below, or by Notice of Electronic Filing via the email address on file with the Court's CM/ECF system:

Thomas C. Rollins, Jr.

Craig M. Geno

DATED, this the 20th day of May, 2025.

/s/Christopher J. Steiskal, Sr.
CHRISTOPHER J. STEISKAL, SR.